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MEMO ENDORSED

Via ECF

The Honorable Katharine H. Parker, U.S.M.J.
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: Rodriguez v. Burlington Stores, Inc. et al.
Civil Action No. 1:22-cv-5170

Dear Judge Parker:

Our Firm represents Defendants Burlington Stores, Inc., Burlington Coat Factory of Texas, Inc., and Burlington Coat Factory Direct Corporation in the above case. This case is presently scheduled for a settlement conference with Your Honor on August 23, 2023 at 2:00 p.m.

I write now to respectfully request the scheduled conference be adjourned and re-scheduled to a new date due my clients' unavailability on the current date. Plaintiff's counsel has graciously consented to this request.

After conferring with Plaintiff's counsel, and my clients, the parties can suggest September 7, 2023 as an alternate date for the conference. Should that date not be available on the Court's calendar, we would leave it to the Court to assign a new date in October, or later, to ensure all participants' attendance.

On a related note, both the National Claims Manager for Burlington Stores, Inc. (Ms. Christianne Quinn) and Burlington's Third Party Administrator (Traveler's Insurance) will attend the settlement conference. However, Ms. Quinn is headquartered in Burlington, New Jersey, and Travelers' representative is located in Texas. For these reasons, I now request the Court's indulgence to permit both Ms. Quinn and Travelers to attend the settlement conference either by video conference, or by telephone, in lieu of personal travel to New York City.



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I greatly appreciate the Court's consideration.

Respectfully,

SPECTOR GADON ROSEN VINCI P.C.

/s/ Randi A. Wolf
RANDI A. WOLF, ESQUIRE

RAW/jg

cc: Laurence D. Rogers, Esquire (via ECF)

APPLICATION GRANTED: The Settlement Conference in this matter scheduled for Wednesday, August 23, 2023 at 2:00 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to Thursday, November 9, 2023 at 2:00 p.m. Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than November 2, 2023 by 5:00 p.m. The National Claims Manager for Burlington Stores, Inc. (Ms. Christianne Quinn) and Burlington's Third Party Administrator (Traveler's Insurance) granted permissions to attend the conference by video. Counsel is directed to complete the Electronic device/Wifi form before conference and submit it to chambers.

APPLICATION GRANTED

Katharine H. Parker

Hon. Katharine H. Parker, U.S.M.J.

07/27/2023